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STATE OF ILLINOIS
Pollution Control Board

February 27, 2002

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Illinois Pollution Control Board
Attn: Dorothy Gunn, Clerk, re: Docket R02-11
James R. Thompson Center
100 W. Randolph St.
Suite 11-500
Chicago, Illinois 60601

P.C.#6

COMMENTS OF THE SPRINGFIELD METRO
SANITARY DISTRICT

The Illinois Environmental Protection Agency is proposing to amend 35 Ill. Adm. Code 304.120 of the Board's regulations by adding a Paragraph (g) which specifies that compliance with the 5-day biochemical oxygen demand (BOD₅) numerical standard in Section 304.120 be determined by analysis of 5-day carbonaceous biochemical oxygen demand.

The Sanitary District is in support of this proposed amendment for the following reasons:

1. Historically the intent of all the regulations were based upon the measure of carbonaceous oxygen demand.
2. The BOD parameter is used as a measure of the efficiency of wastewater treatment and was not intended to measure the organic loading on the receiving stream.
3. The carbonaceous biochemical oxygen demand test as presented in the Standard Methods for the Examination of Water and Wastewater is the accepted norm used by most wastewater agencies.
4. By accepting this amendment, there will be no relief or relaxation of any standard of the Illinois Pollution Control Board. This is just a clarification of what is being done and reported at the present time.

SPRINGFIELD METRO SANITARY
DISTRICT

A handwritten signature in cursive script that reads 'Robert A. Alvey'.
Robert A. Alvey
Director/Engineer